

EXHIBIT A

[Proposed] Order

1 JONATHAN A. SHAPIRO (SBN 257199)
Jonathan.shapiro@bakerbotts.com
2 DANIEL MARTIN (SBN 306794)
Daniel.martin@bakerbotts.com
3 TINA NGO (SBN 324102)
Tina.ngo@bakerbotts.com
4 BAKER BOTTS LLP
101 California Street, Suite 3600
5 San Francisco, CA 94111
Telephone: +1.415.291.6200
6 Fax: +1.415.291.6300

7 Attorneys for
BLACK & VEATCH CONSTRUCTION, INC.
8
9

10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 In Re:
15 PG&E CORPORATION,
16 - and -
17 PACIFIC GAS AND ELECTRIC
COMPANY,
18 Debtors.
19
20
21
22
23
24
25
26
27
28

Bankruptcy Case
Case No.: 19-30088-DM (Lead Case)
Chapter 11

(Jointly Administered)

**ORDER GRANTING BLACK &
VEATCH CONSTRUCTION, INC.'S
MOTION TO QUASH THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS' SUBPOENA
PURSUANT TO FED. R. CIV. P.
45(d)(3)**

1 This matter having come before the Court on non-party Black & Veatch Construction, Inc.'s
2 ("BVC") Motion to Quash the Official Committee of Tort Claimants' (the "TCC") Subpoena
3 Pursuant to Federal Rule of Civil Procedure 45(d)(3) (the "Motion to Quash"), and this Court
4 having reviewed the submissions from counsel, and for good cause shown, the Court hereby
5 **GRANTS BVC's** Motion to Quash.

6 **IT IS HEREBY ORDERED THAT:**

- 7 • The TCC's Subpoena to BVC to Produce Documents, Information, or
8 Objects or to Permit Inspection of Premises in a Bankruptcy Case (or
9 Adversary Proceeding), dated January 15, 2020 (the "Subpoena") is
10 quashed pursuant to Federal Rule of Civil Procedure 45(d)(3);
- 11 • BVC is entitled to recover the attorneys' fees and costs that, as a non-
12 party, BVC reasonably incurred in objecting to the TCC's Subpoena and
13 in bringing the Motion to Quash; and
- 14 • BVC and the TCC are directed to meet and confer regarding an
15 appropriate amount of attorneys' fees and costs to be awarded to BVC
16 pursuant to this Order; if agreement is not reached BVC may bring a
17 regularly noticed motion for such attorneys' fees and costs.

18
19 ** END OF ORDER **
20
21
22
23
24
25
26
27